

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**24 MAG 2351**

UNITED STATES OF AMERICA

v.

MIGUEL CONCEPCION BRITO,

Defendant.

**SEALED COMPLAINT**

Violation of 21 U.S.C. §§ 841 & 846

COUNTY OF OFFENSE:  
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

VICTOR MORALES, being duly sworn, deposes and says that he is a Special Agent with the Homeland Security Investigations ("HSI"), and charges as follows:

**COUNT ONE**  
**(Conspiracy to Distribute Narcotics)**

1. From at least in or about August 2023 through at least in or about December 2023, in the Southern District of New York and elsewhere, MIGUEL CONCEPCION BRITO, the defendant, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

2. It was a part and an object of the conspiracy that MIGUEL CONCEPCION BRITO, the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was (i) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine and (ii) 100 grams and more of mixtures and substances containing a fentanyl analogue, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

The bases for my knowledge of the foregoing charges are, in part, as follows:

4. I am a Special Agent with the HSI and have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and

conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my participation in this investigation, including my review of law enforcement records and other documents, my own observations and observations by other law enforcement officers, and my conversations with other law enforcement officers, I have learned the following, in substance and in part:

a. Since at least in or about 2022, law enforcement officers have been investigating a drug trafficking organization (the “DTO”) operating in and around the New York City metropolitan area, Philadelphia, Pennsylvania, the Dominican Republic, and elsewhere. Specifically, as part of the investigation, law enforcement officers have identified pill press mills operated by the DTO in the northeastern United States to manufacture counterfeit pills containing controlled and dangerous substances like fentanyl and methamphetamine along with other scheduled substances. As part of the DTO, co-conspirators are recruited to prepare and package the United States Postal Service (“USPS”) parcels and ship them to customers nationwide.

b. Based on my training and experience and on information provided by reliable law enforcement sources, I know that individuals often use third-party PC Postage services to add additional layers of anonymity to their transactions. Some of these services allow their customers to purchase postage using cryptocurrency. Third-party PC Postage services also allow postal customers to print labels at home or at a business. Over the last seven years, the United States Postal Inspection Service has intercepted packages shipped using third-party PC Postage services, and many of those packages have contained dangerous controlled substances or contraband.

c. On or about September 18, 2023, a law enforcement officer identified several USPS self service kiosk (“Self Service Kiosk”) locations in the Bronx and Yonkers, New York where mailings bearing third-party PC Postage originated.

d. On or about September 28, 2023, law enforcement officers observed a male, later identified as Angel Valdez Brito<sup>1</sup> (“Valdez Brito”) enter the post office located at 915 Yonkers Ave, Yonkers, New York 10704 (the “Yonkers Post Office”). According to USPS records, Valdez Brito utilized the Self Service Kiosk in the lobby of the Yonkers Post Office and entered approximately 27 USPS Priority Mail parcels into the mail-stream containing prepaid third-party PC postage that accepted cryptocurrency as the form of payment (“September 28 Parcels”). Each of the September 28 Parcels had the same return address. Law enforcement seized one of the September 28 Parcels (“Parcel-1”). A judicially authorized search of Parcel-1 revealed what appeared to be counterfeit pharmaceutical pills; a sample of those pills has since tested positive for the presence of fentanyl.

6. Based on my involvement in this investigation, including my own observations, my conversations with other law enforcement officers, my review of reports and other records,

---

<sup>1</sup> Valdez Brito was charged with violations of 21 U.S.C. § 846 in relation to the conspiracy described herein on December 5, 2023. *See* 23 Mag. 7442.



including records from commercial and law enforcement databases, and my training and experience, I have learned the following, in substance and in part:

a. On or about October 3, 2023, law enforcement officers observed Valdez Brito arrive at the Yonkers Post Office wearing a black delivery backpack. Valdez Brito departed the Yonkers Post Office in a red Honda CRV ("Vehicle-1"), which was being driven by another male ("CC-1"). Valdez Brito and CC-1, then traveled to a second post office located at 4364 Katonah Avenue, the Bronx, New York. CC-1 entered the post office for a few minutes and then returned to Vehicle-1. About forty minutes later, Valdez Brito and CC-1 traveled in Vehicle-1 and parked near a certain building located on Bronx Boulevard, in the Bronx, New York ("Building-1"). Law enforcement officers then observed Valdez Brito and CC-1 enter Building-1 after removing items from Vehicle-1, including a black delivery backpack.

b. On or about October 4, 2023, law enforcement officers observed MIGUEL CONCEPCION BRITO, the defendant, Valdez Brito, and CC-1, unloading Vehicle-1, which was parked near Building-1. Shortly thereafter, Valdez Brito traveled to a post office located at 711 E. Gun Hill Road, the Bronx, New York, 10467 (the "Gun Hill Post Office") where he transferred approximately 25 USPS Priority Mail parcels to a postal employee behind the counter (the "October 4 Parcels"). The October 4 Parcels all contained prepaid third-party PC postage with the same typed return address. Law enforcement seized one of the October 4 Parcels ("Parcel-2"). A judicially authorized search of Parcel-2 revealed what appeared to be counterfeit pharmaceutical pills; a sample of those pills has since tested positive for the presence of methamphetamine.

*MIGUEL CONCEPCION BRITO and Valdez Brito in Front of Building-1 Walking Towards Vehicle-1*



*Valdez Brito at Gun Hill Post Office with Black Delivery Backpack*



c. On or about October 5, 2023, Valdez Brito was observed arriving by moped carrying a black delivery backpack to the Gun Hill Post Office, where he appeared to have obtained shipping materials. After departing the Gun Hill Post Office, Valdez Brito traveled to Building-1, where he remained for about thirty minutes before returning to the Gun Hill Post Office, where he was observed removing several parcels from the black delivery backpack he was carrying and mailing the parcels.

d. On or about November 8, 2023, at approximately 12:36 p.m., CC-1 and a female ("CC-2") were observed leaving Building-1. CC-1 was observed carrying a black delivery backpack. CC-1 and CC-2 then entered a blue Honda CRV ("Vehicle-2") with a black delivery backpack; the pair then drove away. About an hour later CC-1 and CC-2 returned in Vehicle-2 and then entered Building-1. At the time, CC-1 was observed carrying a green colored shopping bag and what appeared to be the black delivery backpack that he was observed carrying earlier that day. At approximately 1:37 p.m., MIGUEL CONCEPCION BRITO, the defendant, and CC-2, were observed exiting Building-1 and then accessing Vehicle-1, which was parked nearby. MIGUEL CONCEPCION BRITO removed what appeared to be a black canvas backpack from Vehicle-1; he and CC-2 then returned to Building-1. At approximately 3:44 p.m., Valdez Brito and CC-1 were observed exiting Building-1, each carrying a black delivery backpack, and traveling to the Yonkers Post Office, where they were again observed mailing multiple parcels.

7. Based on my involvement in this investigation, including my own observations, my conversations with other law enforcement officers, my review of reports and other records, including records from commercial and law enforcement databases, and my training and experience, I have learned the following, in substance and in part:



a. Vehicle-1 is registered to CC-2. CC-2 is listed in law enforcement databases as the registered tenant for a third-floor apartment in Building-1 (the "Apartment-1").

b. On or about November 16, 2023, law enforcement officers reviewed surveillance footage of a camera facing Apartment-1. That footage shows MIGUEL CONCEPCION BRITO, the defendant, as well as Valdez Brito, CC-1 and CC-2 entering and exiting Apartment-1 on multiple occasions, including on November 8, 2023, when Valdez Brito and CC-1 were observed carrying black delivery backpacks and traveling to post offices to mail parcels retrieved from the black delivery backpacks.

8. Based on my involvement in this investigation, including my own observations, my conversations with other law enforcement officers, my review of reports and other records, including records from commercial and law enforcement databases and my training and experience, I have learned the following, in substance and in part:

a. On December 4, 2023, Vehicle-1 was parked in the vicinity of Building-1, and a judicially authorized search led to the discovery of, among other things, approximately 163,000 multicolored counterfeit pharmaceutical pills, which lab tested positive for methamphetamine weighing approximately seventeen kilograms and a fentanyl analogue weighing approximately thirty kilograms.

*Counterfeit Pharmaceutical Pills Recovered from Vehicle-1 Including Those That Tested Positive for Methamphetamine and Cocaine*



b. On December 4, 2023, a judicially authorized search of Apartment-1 led to the discovery of postal packaging like the kind Valdez Brito and CC-1 were observed mailing, bubble wrap, label printing equipment, receipts of prior USPS mailings, vacuum sealed bags like the kind recovered from Parcel-1 and Parcel-2, an apparent drug ledger listing payments to various parties, including names such as "Miguel," and a red Apple iPhone ("Red Apple iPhone"), among other things.

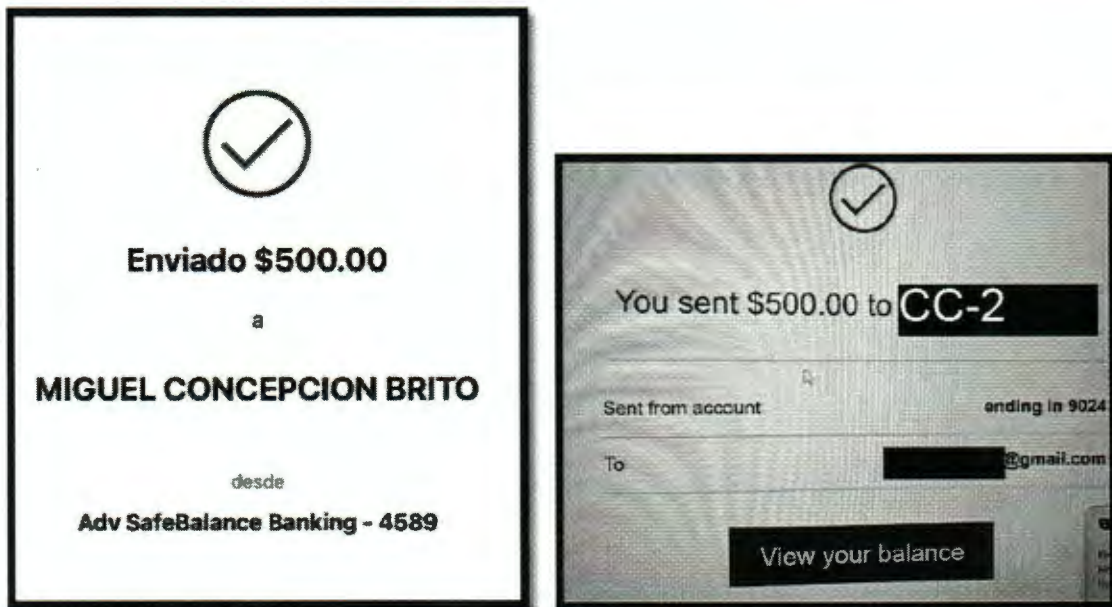
c. A judicially authorized search of the Red Apple iPhone revealed, among other things, a certain WhatsApp conversation with a number ending in 5023 ("x5023 WhatsApp Chat") that exchanged pictures of: pills like the kind recovered from Vehicle-1, the apparent drug ledger, USPS receipts showing shipments, USPS labels and packaging, and screenshots of payments made to Miguel Concepcion Brito and CC-2.

*Screenshots of Counterfeit Pills and Shipping Label and Receipt Obtained from the x5023 WhatsApp Chat*





*Screenshots of Payments to MIGUEL CONCEPCION BRITO and CC-2 Obtained from the x5023 WhatsApp Chat*



9. Based on my participation in this investigation, including my review of law enforcement records and other documents, my own observations and observations by other law enforcement officers, and my conversations with other law enforcement officers, I have learned the following, in substance and in part:

a. CC-2 is the registered tenant of Apartment-1, and the registered owner of Vehicle-1, where the narcotics were located. A review of law enforcement databases lists CC-2 and "Miguel Concepcion Brito" as the parents of a minor child. Based on my review of photographs in law enforcement databases of "Miguel Concepcion Brito," my review of surveillance photographs, my review of social media photographs showing a person resembling the man who retrieved what appeared to be a black canvas backpack from Vehicle-1 and CC-2 pictured with a minor child, my own observations, my review of the x5023 WhatsApp Chat showing discussions regarding shipments of counterfeit pharmaceutical pills and funds being transferred to "Miguel Concepcion Brito," I believe that the person observed entering and exiting Apartment-1 and retrieving items from Vehicle-1 is MIGUEL CONCEPCION BRITO, the defendant.

WHEREFORE, I respectfully request that a warrant issue for the arrest of MIGUEL CONCEPCION BRITO, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s/ Victor Morales, by the Court, with permission

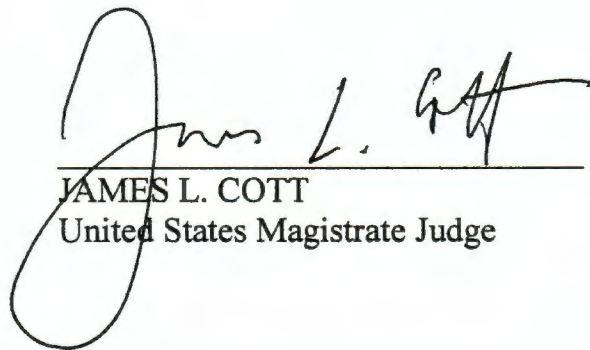
---

VICTOR MORALES

Special Agent

Homeland Security Investigations

Sworn to before me through the transmission of  
this Affidavit by reliable electronic means, pursuant to  
Federal Rules of Criminal Procedure 41(d)(3) and 4.1.  
this 21 day of June 2024



---

JAMES L. COTT

United States Magistrate Judge